

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

11 MAR 1992

Dockets  
222

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IN REPLY REFER TO:

CN9200666

Honorable Robert Graham  
United States Senator  
Post Office Box 3050  
Tallahassee, FL 32315

92-9/

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Federal Communications Commission  
Office of the Secretary

Dear Senator Graham:

Thank you for your letter regarding Commission proposals to allocate spectrum for personal communication services. Your constituent, Mr. Darrell R. DuBose, Assistant General Manager for Electric System Operations of Gainesville Regional Utilities, expressed concern to you regarding proposals to reallocate frequencies at 2 GHz that would impact the electric, gas, water and waste-water utilities.

On January 16, 1992, the Commission adopted a Notice of Proposed Rule Making (Notice) in ET Docket No. 92-9 that proposes allocating 220 MHz of spectrum at 2 GHz for use by new services and technologies. The Office of Engineering and Technology has developed a fact sheet that outlines this proposal. I have enclosed a copy for your information. In addition, because there has been some confusion about how this proposal would impact local and state government agencies, I have enclosed a fact sheet that describes how those agencies would be affected by certain spectrum policies currently under consideration.

Briefly, under the Commission's proposal, state and local government licensees, including public safety agencies, would indefinitely continue their current operations on a primary basis. Other existing licensees would be permitted to continue their current operations on a primary basis for a period of time to be established - such as 10 or 15 years. Subsequently, they would be permitted to continue operating only on a secondary basis. Expansion and new microwave systems would be permitted on a primary basis only at higher frequencies. In conjunction with the Notice, the Commission released a staff study of existing use of this spectrum and identified other suitable frequencies available for this purpose. To further facilitate accommodation of the competing demands for this spectrum, the Commission also proposed to permit negotiation of financial arrangements between existing licensees and parties proposing new services. Such an approach would facilitate access to this spectrum for services employing emerging technologies.

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These provisions are intended to prevent disruption to the communications of the existing licensees, yet still provide the spectrum needed by U.S. companies to develop new and innovative telecommunications products and services and bolster U.S. competitiveness in world telecommunications markets. An example of one such new proposed service is the personal communications service (PCS), which the Commission is addressing concurrently in GEN Docket No. 90-314.

The needs of the existing 2 GHz users are of importance to the Commission, and are being taken carefully into consideration. Please be assured that Mr. DuBose's concerns will be taken into account before a final determination is made in this matter. For that purpose, I am making this correspondence part of the record in the two dockets discussed above, ET Docket No. 92-9 and GEN Docket No. 90-314.

Sincerely,

A handwritten signature in cursive script, reading "Thomas P. Stanley".

Thomas P. Stanley  
Chief Engineer

Enclosures

**Bob Graham**  
Florida

**United States Senate**  
Washington, D.C.

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90,314  
Date 2/27/92

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Federal Communications Commission  
Office of Congressional Affairs  
Room 808, 1919 M Street  
Washington, D.C. 20554

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*Enclosed is a letter from one of my constituents who has concerns which come under the jurisdiction of your agency.*

*I would appreciate your reviewing this situation and providing me with an appropriate response. Please direct your reply to:*

Sharon McLanahan  
Office of Senator Bob Graham  
Post Office Box 3050  
Tallahassee, FL 32315

904/422-6100

*Your cooperation and assistance are appreciated.*

*With kind regards,*

*Sincerely,*



**United States Senator**

**Constituent's Name:**

*Mr. Darrell R. DuBoise*



GAINESVILLE REGIONAL UTILITIES

Electric System Operations

January 3, 1992

Ms. Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: PCS Inquiry -- Gen Docket 90-314

Dear Madam Secretary:

Gainesville Regional Utilities hereby submits its comments regarding the Federal Communications Commission's PCS Inquiry and recent En Banc hearing regarding PCS.

Gainesville Regional Utilities (GRU) is a municipally owned and operated, full service organization providing electric, gas, water and waste-water utilities to more than 62,000 customers. GRU's service area encompasses approximately 150 square miles, in and around the City of Gainesville, Alachua County, in North Central Florida. In addition to local services, GRU provides wholesale electric service to the City of Alachua and to Clay Electric Cooperative, Inc. as well as providing firm electric interchange service to the City of Starke, Reedy Creek Energy Services and the Florida Municipal Power Association.

In 1986, Gainesville Regional Utilities replaced a data wireline system that had become unreliable and was limited in data speed and capacity. This wire system was replaced by a 2000 MHz loop system microwave backbone at a cost of in excess of \$1 million in order to ensure a reliable network with increased capacity and capabilities for use by utility system operations, as well as, the City of Gainesville's Public Safety Departments. Currently, GRU uses the 2000 MHz network for Automatic Generation Control (AGC), System Control and Data Acquisition (SCADA), land mobile communications and as a hot-line connection to both city and county E-911 facilities for the purposes of coordination during emergencies. The City of Gainesville's Public Safety Departments are also dependent on this network for land mobile communications.

Gainesville Regional Utilities opposes a reallocation of spectrum in the 1850-2200 MHz band for the development of Personal Communications Networks (PCN). Gainesville is a progressive, college community making eventual deployment of a licensed PCN system within GRU's operating area very probable and of serious concern to this utility. If forced to vacate this spectrum, GRU's only option to maintain the required level of reliability would be to install a very expensive fibre optic communications system.

Leased circuits simply could not furnish the reliability, and capability that is currently provided by GRU's microwave communications. Moving to the 6000 MHz or higher frequency microwave bands as has been proposed by some is not a practical alternative due primarily to local frequency congestion and the susceptibility of these bands to path fades caused by heavy Florida rains. This is a real concern for all microwave users in the state of Florida. While fiber optics would provide the most suitable alternative, this option would be expensive and the cost would be passed on to the customer in the form of rate increases.

Gainesville Regional Utilities understands that certain proponents of PCN are claiming that PCN can share the fixed microwave bands through the use of spread spectrum or other techniques. GRU is skeptical of these claims, and urges the FCC to review these claims carefully before authorizing PCN on a band-sharing basis. GRU depends heavily on its microwave communications and any disruption or interference could not be tolerated.

In no event should a fixed microwave user be forced to relocate from the 1850-2200 MHz band until:

- 1) There is adequate replacement spectrum made available in close proximity to the 1850-2200 Mhz band.
- 2) Adequate time is allowed to construct replacement facilities.
- 3) The cost for any relocation is paid for by the PCN licensee.

Any compensation for the relocation of existing users should be arrived at through negotiations between the existing user and the PCN licensee.

Very truly yours,



Darrell R. DuBose  
Assistant General Manager  
Electric System Operations  
Gainesville Regional Utilities

cc: Representative Michael Bilirakis  
Senator Bob Graham  
Michael Kurtz, General Manager  
Raymond Manasco, Utilities Attorney



January 3, 1992

Senator Bob Graham  
241 Dirksen Senate Office Building  
Washington, D. C. 20510

Re: PCS Inquiry -- Gen Docket 90-314

Dear Senator Graham:

As you may be aware, the Federal Communications Commission (FCC) is considering reallocating the microwave spectrum between the 1850 to 2200 MHz band to Personal Communication Networks (PCN) and as a reserve for emerging technologies.

Gainesville Regional Utilities (GRU), a municipal utility, is currently using the 2000 MHz section of this spectrum and have expressed our concerns and opposition to this reallocation in the attached communication to the FCC. GRU is concerned that the FCC is not seriously considering the threat to power system operating reliability and the economic impact that reallocation will have on existing users with licenses in this spectrum.

Gainesville Regional Utilities urges you to contact the committee chairman or ranking member of both the House Energy and Commerce Committee and the Senate Commerce Committee to request an oversight hearing. An oversight hearing would provide the appropriate forum to discuss these important issues.

Thank you for your attention and assistance in this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Darrell R. DuBose".

Darrell R. DuBose  
Assistant General Manager  
Electric System Operations  
Gainesville Regional Utilities

xc: Michael Kurtz, General Manager  
Raymond Manasco, Utilities Attorney